

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

ALEXANDER GULKAROV, et al.  
Defendant.

22-CR-020 (PGG)

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Rule 1.16 of the New York Rules of Professional Conduct, and Local Civil Rule 1.4 as applied through Local Criminal Rule 1.1, Attorney Catherine M. Deist hereby files this motion to withdraw as counsel for Defendant Robert Wisnicki in this action and, in support thereof, states as follows:

1. On or about January 14, 2022, Defendant Wisnicki retained Mukasey Frenchman LLP to represent him in the above styled case. Subsequently, Marc Mukasey, Kenneth Caruso, and Catherine Deist entered appearances with this honorable Court as Defendant Wisnicki's Counsel of Record.

2. As of January 1, 2023, Attorney Deist is employed by another law firm, located in Virginia Beach, Virginia.

3. Defendant Wisnicki is aware of Attorney Deist's change in employment, and agrees that Attorney Deist should be discharged from representing him in this matter.

4. Withdrawal is, therefore, mandatory under New York Rule of Professional Conduct 1.16(b)(3), which provides that "a lawyer shall withdraw from the representation of a client when . . . the lawyer is discharged[.]"

5. Attorney Deist's withdrawal will not adversely affect Defendant Wisnicki, as he is still represented by Attorney Mukasey and Attorney Caruso.

6. Attorney Deist does not assert any retaining lien upon Defendant Wisnicki's file.

7. For all of the foregoing reasons, Attorney Deist respectfully requests that this Court grant her motion to withdraw.

Dated: Virginia Beach, Virginia  
February 14, 2023

Respectfully submitted,

CATHERINE M. DEIST

/s/ Catherine M. Deist  
Catherine M. Deist  
Ernest Law Group, PLC  
505 S. Independence Blvd., Ste. 103  
Virginia Beach, VA 23452  
cdeist@ernestlawgroup.net  
(757) 289-2499

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**



**Paul G. Gardephe, U.S.D.J.**

Dated: February 21, 2023